

EXHIBIT 72

Proposed Amendment to the 2009 IMC

Section 606 - Smoke Detection Systems Control

PROPOSED LANGEUGE (underlined):

606.2 Where required. Smoke detectors shall be installed where indicated in Sections 606.2.1 through 606.2.4.

Deleted: 606.2.3

Exception: Smoke detectors shall not be required where air distribution systems are incapable of spreading smoke beyond the enclosing walls, floors and ceilings of the room or space in which the smoke is generated.

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606.2.1 Location of smoke detectors. Smoke detectors shall be installed downstream of the air filters and ahead of any branch connections in air supply systems having a capacity greater than 944 L/sec (2000 ft³/min).

606.2.2. Return air systems. Smoke detectors shall be installed in return air systems with a design capacity greater than 2,000 cfm (0.9 m³/s), in return air duct or plenum upstream of any filters, exhaust air connections, exhaust air connections, outdoor air connections, or decontamination equipment and appliances.

Deleted: 606.2.1

Exception: Smoke detectors are not required in the return air system where all portions of the building served by the air distribution system are protected by area smoke detectors connected to a fire alarm system in accordance with the International Fire code. The area smoke detection system shall comply with Section 606.4.

606.2.3 Common supply and return air systems. Where multiple air-handling systems share common supply or return air ducts or plenums with a combined design capacity greater than 2,000 cfm (0.9 m³/s), the return air system shall be provided with smoke detectors in accordance with Section 606.2.1. and 606.2.2.

Deleted: 606.2.2

Exception: Individual smoke detectors shall not be required for each fan-powered terminal unit, provided that such units do not have an individual design capacity greater than 2,000 cfm (0.9 m³/s) and will be shut down by activation of one of the following:

1. Smoke detectors required by Sections 606.2.1., 606.2.2 and 606.2.4.
2. An approved area smoke detector system located in the return plenum serving such units.

Deleted: 606.2.3.

3. An area smoke detector system as prescribed in the exception to Section 606.2.2.
In all cases, the smoke detectors shall comply with Sections 606.4 and 606.4.1.

Deleted: 606.2.1

606.2.4. Return air risers. Where return air risers serve two or more stories and serve any portion of a return air system having a design capacity of greater than 15,000 cfm (7.1 m³/s), smoke detectors shall be installed at each story. Such smoke detectors shall be located upstream of the connection between the return air riser and any air ducts or plenums.

Deleted: 606.2.3

REASON FOR THE PROPOSED CHANGE (AMENDMENT).

This additional requirement to the Mechanical Code is to clarify what is currently required in NFPA 90A into one code (IMC) for the design professionals and installers to be able to reduce the duplicity that is currently being utilized in the enactment of both codes.

Most sheetmetal workers (installers) are familiar with the IMC and not so familiar with NFPA 90A. It becomes most obvious when or if there are any permits required for the duct distribution system. Most permits are handled through the building departments and would include a mechanical permit for the installation of duct distribution systems. Most installing contractors are not aware of the NFPA 90A requirements especially at the time of permit application or installation. Most instances are when the Fire Department happens to do their inspections that then the installers are told of the NFPA 90A requirement for a duct smoke detector in the supply side, even though the IMC which is what the installer has a permit for doesn't require such. Ultimately it winds up being required by the Fire Departments through enforcement of NFPA 90A.

I believe that adding the (NFPA 90A) language to the IMC, puts all the duct smoke detectors under one code (IMC) that is most familiar to the contractors and design professionals.

Submitted by:

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